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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MILTON CACERES MOLINA a/k/a MILTON
CANALES MOLINA,

Plaintiff,

- against -

WILLIAM JOYCE, *et al.*,

Defendants.

25 Civ. 1844 (LAK)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, the Declaration of William Morrow dated April 11, 2025, and all prior papers and pleadings in this action, Defendants William Joyce, Todd Lyons, Kristi Noem, and Pamela Bondi (collectively, “Defendants”), by their attorney, Matthew Podolsky, Acting United States Attorney for the Southern District of New York, will move this Court, before the Honorable Lewis A. Kaplan, United States District Judge, at the United States Courthouse, 500 Pearl Street, Courtroom 21B, New York, New York, as soon as counsel may be heard, for an order dismissing this action pursuant to Federal Rule of Civil Procedure 12(b)(2) and (3), or in the alternative, transferring this action to the United States District Court for the Western District of Louisiana, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York
April 11, 2025

MATTHEW PODOLSKY
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Attorney for Defendants

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